

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Verisign, Inc.,

Plaintiff,

v.

XYZ.com, LLC and Daniel Negari,

Defendants.

Case No. 1:14-cv-01749 CMH-MSN

**DECLARATION OF JASON SYKES IN SUPPORT OF  
DEFENDANTS' MOTIONS IN LIMINE**

I, Jason Sykes, hereby declare:

1. I am counsel for defendants XYZ.com, LLC and Daniel Negari (“Defendants”), over the age of 18, and competent to testify in this action.


2. On April 15, 2015, Verisign served its initial disclosures.

3. On July 30, 2015, Verisign served a document titled “Exhibit A to Verisign’s Initial Disclosures: XYZ’s False Statements.” Attached as **Exhibit A** is a true and correct copy of that document.

4. Attached as **Exhibit B** are true and correct deposition excerpts from the July 17, 2015 deposition of Holden Andrews.

I certify and declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed October 23, 2015 at Seattle, Washington.

  
Jason Sykes

**CERTIFICATE OF SERVICE**

I certify that on October 23, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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